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DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 5/23/11

May 20, 2011

BY FAX (212) 805-6326

Hon. Colleen McMahon
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

Re: Oakley et. al. v. Verizon Communications, Inc. et al.,
09 Civ. 9175 (CM) (MHD)

Dear Judge McMahon:

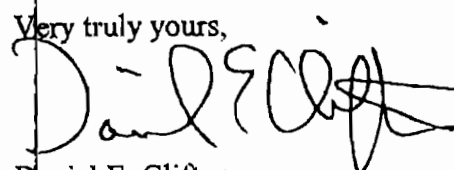
I represent the plaintiffs in this FMLA action Verizon Communications, Inc. Under an agreed upon briefing schedule, plaintiffs' motion for class certification is due on May 27, 2011. I write to request permission to file a brief in excess of the 25-page limit set forth in the court's individual rules.

There are 38 named plaintiffs and 18 defendants in this case. Over the past year, the parties have conducted a very substantial amount of discovery, including 51 depositions and the exchange of more than 150,000 pages of documents. In preparing the class certification motion, we have come to realize that we will need more than 25 pages to adequately discuss all of the issues involved in this case and make the argument for class certification. Although I will make a great effort to keep the number of pages to a minimum, I request permission to file a brief on behalf of the plaintiffs with a maximum of 40 pages.

Thank you for your consideration of this request.

OLC
Colleen McMahon
5/23/11

Very truly yours,

A handwritten signature in black ink, appearing to read "Daniel E. Clifton", with a stylized flourish at the end.

Daniel E. Clifton

cc: Lorie E. Almon, Esq.
Krista Green Pratt, Esq.
Christie Del Rey-Cone, Esq.
Gabrielle Semel, Esq.
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